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VIA ECF

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Hon. Esther Salas, U.S.D.J..
U.S. District Court District of New Jersey
50 Walnut Street
Newark, NJ 07101

**Re: Hudson Hospital Opco, LLC et al. v. Cigna Health and Life Ins. Co., et al.,
No. 2:22-cv-04964-ES-JBC**

Dear Judge Salas:

This firm represents the Plaintiffs in the above-referenced matter. By Order entered on September 29, 2023 (D.E. No. 39), Your Honor granted Defendants' motion to dismiss Plaintiffs' Amended Complaint without prejudice to Plaintiffs' filing a Second Amended Complaint ("SAC") within 30 days thereof to cure the deficiencies identified in Your Honor's Opinion dated October 3, 2023 (D.E. No. 40). Plaintiffs' deadline to file its SAC expires on October 30, 2023. See Fed. R. Civ. P. 6(a)(1)(C). We write, with consent of counsel for Defendants, to respectfully request a 30-day extension of this deadline, to **November 29, 2023**. The parties have also agreed to an extension of Defendants' deadline to respond to the SAC, to **January 12, 2024**, and to a subsequent briefing schedule in the event that Defendants file a motion to dismiss the SAC. Enclosed for Your Honor's consideration is a proposed Stipulation and Order memorializing the foregoing and the parties' agreed-upon briefing schedule in the event that Defendants' move to dismiss the SAC. The parties have stipulated and agreed to the form of the enclosed Order. If it meets with Your Honor's approval, we respectfully ask that Your Honor enter same.

We thank Your Honor for your continued courtesies attention to this matter.

Respectfully submitted,

/s/ George P. Barbatsuly

George P. Barbatsuly
Enclosure

cc: All counsel of record (via ECF) (w/encl.)